

DOC NO  
REC'D/FILED

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

2021 APR 14 PM 3: 18

PETER OPPENEER  
CLERK US DIST COURT  
WD OF WI

UNITED STATES OF AMERICA

SEALED INDICTMENT

v.

Case No. **21 CR 042 WMC**  
21 U.S.C. § 841(a)(1)  
21 U.S.C. § 846

DAVID STONE III, CHAI VANG,  
AARON GUSKI, MALA  
PERSAUD, and MARCIE LEOSO,

Defendants.

THE GRAND JURY CHARGES:

COUNT 1

1. From on or about January 2, 2020, to on or about May 1, 2020, in the Western District of Wisconsin and elsewhere, the defendants,

DAVID STONE III, CHAI VANG, AARON GUSKI, MALA PERSAUD,  
and MARCIE LEOSO,

knowingly and intentionally conspired with each other, and with others known and unknown to the grand jury, to distribute and to possess with intent to distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, and a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (fentanyl), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

2. With respect to defendants DAVID STONE III, CHAI VANG, AARON GUSKI, and MARCIE LEOSO, the amount involved in the conspiracy attributable to them as a result of their own conduct, and the conduct of other conspirators reasonably

foreseeable to them, was 40 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propenamide (fentanyl).

(All in violation of Title 21, United States Code, Section 846).

COUNT 2

From on or about January 2, 2020, to on or about May 1, 2020, in the Western District of Wisconsin and elsewhere, the defendants,

DAVID STONE III, CHAI VANG, AARON GUSKI, MALA PERSAUD,  
and MARCIE LEOSO,

knowingly and intentionally conspired with each other, and with others known and unknown to the grand jury, to distribute and to possess with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

(In violation of Title 21, United States Code, Section 846).

COUNT 3

On or about March 19, 2020, in the Western District of Wisconsin, the defendant,

MALA PERSAUD,

knowingly and intentionally possessed with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1)).

COUNT 4

On or about April 17, 2020, in the Western District of Wisconsin, the defendant,  
AARON GUSKI,  
knowingly and intentionally possessed with intent to distribute a mixture or substance  
containing a detectable amount of heroin, a Schedule I controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1)).

COUNT 5

On or about April 17, 2020, in the Western District of Wisconsin, the defendant,  
MARCIE LEOSO,  
knowingly and intentionally possessed with intent to distribute a mixture or substance  
containing a detectable amount of heroin, a Schedule I controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1)).

COUNT 6

On or about April 30, 2020, in the Western District of Wisconsin, the defendant,  
AARON GUSKI,  
knowingly and intentionally possessed with intent to distribute 40 grams or more of a  
mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-  
4-piperidiny] propenamide (fentanyl), a Schedule II controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1)).

COUNT 7

On or about April 30, 2020, in the Western District of Wisconsin, the defendant,  
MARCIE LEOSO,

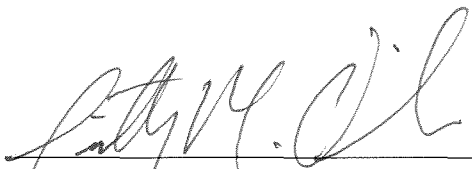
knowingly and intentionally possessed with intent to distribute 40 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propenamide (fentanyl), a Schedule II controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1)).

A TRUE BILL

  
PRESIDING JUROR

Indictment returned: 04/14/21

  
TIMOTHY M. O'SHEA  
Acting United States Attorney